

Exhibit 1

List and Description of Accounts for Requested
Third-Party Discovery

**LIST AND DESCRIPTION OF ACCOUNTS IN SUPPORT OF CFTC’S MOTION FOR
LEAVE TO ENGAGE IN LIMITED THIRD-PARTY DISCOVERY**

Plaintiff seeks leave of court to serve subpoenas upon the following financial institutions and digital currency exchanges:

- **American Express Company:** Plaintiff has identified at least one American Express account in the name of Saffron that he may have used to receive and/or spend customer funds.

ACCOUNT NAME	ACCOUNT NO.
David Saffron	****8202

- **Bank of America:** Plaintiff has identified at least one Bank of America account in the name of Saffron’s father, Alan G. Saffron (“ASaffron”), that may hold or have held Defendants’ assets.

ACCOUNT NAME	ACCOUNT NO.
Alan G. Saffron	****1927

- **BitPay, Inc. (“BitPay”):** Plaintiff has identified at least thirteen BitPay accounts that Defendants may have used to deposit customer funds. BitPay is a Bitcoin (“BTC”) payment processor located in Atlanta, Georgia.

ACCOUNT NAME	ACCOUNT NO.
Unknown	****SHvg
Unknown	****uwFU
Unknown	****z9qb
Unknown	****zicY
Unknown	****eckE
Unknown	****wPQQ
Unknown	****Udf4
Unknown	****MxHg
Unknown	****h1Bj
Unknown	****HmPe
Unknown	****xg7t
Unknown	****ec7g
Unknown	****GxrP

- **Coinbase, Inc. (“Coinbase”)**: Plaintiff has identified at least one Coinbase account that Defendants may have used to deposit customer funds. Coinbase, located in San Francisco, California, is a digital currency exchange.

ACCOUNT NAME	ACCOUNT NO.
Unknown	****Axct

- **Comanche National Bank**: Plaintiff has identified at least one Comanche National Bank account in the name of Hydra Auctions, LLC (“HAL”) that Defendants used to deposit customer funds. HAL, located in Mineral Wells, Texas, is an entity affiliated with one of Saffron’s promoters. At least one customer wired \$43,000 to the HAL account for the purchase of BTC.

ACCOUNT NAME	ACCOUNT NO.
Hydra Auctions, LLC	****2658

- **Comerica Bank**: Plaintiff has identified at least four Comerica Bank accounts (in the names of ASaffron, Alternative Renewable Solutions, LLC (“ARS”), and HAL) that Defendants may have used to deposit customer funds. ARS, located in Houston, Texas, is an entity affiliated with one of Saffron’s promoters. At least one customer wired \$462,000 to ARS account *6966 for the purchase of BTC.

ACCOUNT NAME	ACCOUNT NO.
Alan G. Saffron	****4010
Alan G. Saffron	****8812
Alternative Renewable Solutions, LLC	****6966
Hydra Auctions, LLC	****7612

- **FirstView, LLC (“FirstView”)**: Plaintiff has identified at least one FirstView account in the name of Vincent Mazzotta (“Mazzotta”) that may hold or have held Defendants’ assets. Mazzotta is believed to reside in Scottsdale, Arizona and/or Los Angeles, California, and is the President of a company called Runway Beauty, Inc. (“RB”). Further, Saffron is a signatory on an RB bank account held at Wells Fargo Bank. FirstView is a provider of pre-paid electronic payment services based in Atlanta, Georgia.

ACCOUNT NAME	ACCOUNT NO.
Vincent Mazzotta	****9979

- **Gemini Trust Company, LLC (“Gemini”)**: Plaintiff has identified at least five Gemini accounts that Defendants may have used to deposit customer funds. Gemini is a digital currency exchange located in New York, New York.

ACCOUNT NAME	ACCOUNT NO.
Unknown	****TvBW
Unknown	****r5FW
Unknown	****CNUb

Unknown	****Wxok
Unknown	****u28gt

- **JPMorgan Chase Bank (“JPMC”)**: Plaintiff has identified at least seven JPMC accounts that may hold or have held Defendants’ assets.

Bedrock Protection Agency, LLC (“Bedrock”) d/b/a Bedrock Special Projects Group, LLC (“Bedrock SPG”) provides security and protection services to high-net worth individuals, family offices, corporations, and executives. Bedrock and Bedrock SPG are registered corporations in both Nevada and Utah and provided personal security services to Defendants. Bedrock and Bedrock SPG are also believed to have handled all of Defendants’ financial affairs. In exchange for these services, Defendants provided at least \$1.8 million worth of BTC to Bedrock from March 2018 through March 2019.

James Damien Scott (“JScott”) resides in American Fork, Utah and is a Partner and Chief Operating Officer of Bedrock SPG.

Kagel Law is former or current legal counsel to one or both Defendants.

P. Sterling Kerr a/k/a Preston Sterling Kerr was the former registered agent for Defendant Circle Society and attorney to Defendant Saffron.

Kinetic Marketing Systems, Inc. (“Kinetic”) is a Wyoming registered corporation believed to be affiliated with Susan Scott, wife of JScott, that allegedly provided marketing services for Defendants. Further, Saffron listed Kinetic JPMC account *9059 in his Gemini digital currency account opening documents. At least one customer wired \$12,000 to Kinetic account *5763 for the purchase of BTC.

Mazzotta is a business partner of Defendant Saffron as discussed above.

ACCOUNT NAME	ACCOUNT NO.
James Damien Scott	****3287
Kagel Law, A Professional Corporation	****6073
Kagel Law, A Professional Corporation	****6518
Kinetic Marketing Systems, Inc.	****9059
Kinetic Marketing Systems, Inc.	****5763
P. Sterling Kerr	****2652
Vincent Mazzotta	****0259

- **NBH Bank (“NBH”)**: Plaintiff has identified at least three NBH accounts that may hold or have held Defendants’ assets. At least seven customers wired a total of approximately \$86,905 to HAL account *9406 for the purchase of BTC. ARS Management LLC is another name for Alternative Renewable Solutions, LLC (discussed above).

ACCOUNT NAME	ACCOUNT NO.
Alternative Renewable Solutions, LLC	****3335
ARS Management LLC	****8386
Hydra Auctions, LLC	****9406

- **PNC Bank (“PNC”)**: Plaintiff has identified at least one PNC account in the name of ASaffron that may hold or have held Defendants’ assets.

ACCOUNT NAME	ACCOUNT NO.
Alan G. Saffron	****0955

- **Uphold HQ, Inc. (“Uphold”)**: Plaintiff has identified at least one Uphold account that Defendants may have used to deposit customer funds. Uphold is a digital currency exchange located in Larkspur, California.

ACCOUNT NAME	ACCOUNT NO.
Unknown	**** zgdZ

- **Wells Fargo Bank (“WF”)**: Plaintiff has identified at least two WF accounts in the names of Saffron and RB that may hold or have held Defendants’ assets. RB is an Arizona registered corporation owned by Mazzotta, and Saffron is a signatory on RB account *2409 along with Mazzotta. Defendants may have used these accounts to spend and/or receive customer funds (from May 2020 through July 2020, the accounts received aggregate deposits totaling approximately \$433,458 and had withdrawals totaling approximately \$337,505).

ACCOUNT NAME	ACCOUNT NO.
David Saffron	****3959
Runway Beauty, Inc.	****2409

- **Zions Bancorporation, N.A. d/b/a Nevada State Bank (“NSB”)**: Plaintiff has identified at least two NSB accounts in the name of Bedrock that may hold or have held Defendants’ assets. As discussed above, Bedrock and Bedrock SPG provided personal security services to Defendants and are believed to have handled all of Defendants’ financial affairs.

ACCOUNT NAME	ACCOUNT NO.
Bedrock Protection Agency, LLC	****8205
Bedrock Protection Agency, LLC	****9700